

UNITED STATES DISTRICT COURT

for the

Central District of California

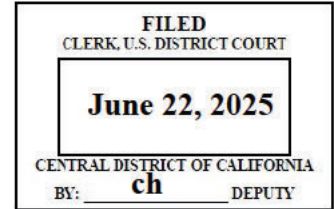
United States of America

v.

Jose Cervantes Licea,

Defendant.

Case No. 2:25-MJ-03798-DUTY



**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of June 20, 2025 in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 111(a)(1)

Offense Description

Assault on a Federal Officer

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/

Complainant's signature

Joseph McKenzie, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 6/22/25



Judge's signature

City and state: Los Angeles, California

Hon. Brianna Mircheff, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Joseph McKenzie, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint against Jose Cervantes Licea ("CERVANTES"), charging him with violating Title 18, United States Code, Section 111(a)(1) (Assault on a Federal Officer).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AGENT

3. I am a Special Agent ("SA") with Homeland Security Investigations ("HSI") and have been so employed since March 2018. I am a graduate of the Federal Law Enforcement Center in Glynco, Georgia, where I completed the Basic Criminal Investigator Training Program and the HSI Special Agent Training Program. I received seventeen weeks of training in the detection and investigation of violations investigated by HSI; including fraud and financial crimes including money laundering. In addition, I have received a Bachelor's Degree in Accounting and

Finance from American Intercontinental University, and a Graduate Certificate in Forensic Accounting from George Mason University. I am currently assigned to the El Camino Real Financial Crimes Taskforce, which investigates financial crimes related to bulk cash smuggling, trade-based money laundering, access device fraud, and other financial crimes. I have assisted other agents in numerous financial related investigations in the Central District of California.

III. STATEMENT OF PROBABLE CAUSE

4. Based on witness interviews, my review of body worn camera footage, and my knowledge of this investigation, I know the following:

5. On or about June 20, 2025, Border Patrol Agents from United States Customs and Border Protection were conducting interior immigration enforcement operations in the city of Bell, California, within the Central District of California. As part of those operations, at approximately 2:42 p.m. at the Jack's Carwash located on Atlantic Avenue, Border Patrol Agent ("BPA") C.M. arrested an individual (later identified as M.D.) who BPA C.M. believed was in the United States without legal status.

6. Following that arrest, BPA C.M. began moving M.D. toward BPA C.M.'s government-issued car so he could transport M.D. for further processing. Before BPA C.M. reached his car, however, BPA C.M. saw CERVANTES running at him with his shoulder lowered. Then, BPA C.M. lowered his shoulder as CERVANTES's shoulder made contact with BPA C.M.'s body. As BPA C.M. absorbed that contact, he felt CERVANTES grab at his arms in an

apparent effort to pry M.D. away from BPA C.M. Another BPA intervened and pulled CERVANTES away from BPA C.M., but in the midst of that struggle, BPA C.M. lost control of M.D. and M.D. ran away (though he was apprehended later).

IV. CONCLUSION

7. For all the reasons described above, there is probable cause to believe that CERVANTES LICEA has committed a violation of Title 18, United States Code, Section 111(a)(1) (Assault on a Federal Officer).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 22 day of June
2025.



HONORABLE BRIANNA MIRCHEFF
UNITED STATES MAGISTRATE JUDGE